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**Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems**

Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular ("MMC"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission" or "FCC") *Fourth Report and Order* in CC Docket No. 94-102,<sup>1</sup> hereby files a Quarterly Report for the quarter ending June 30, 2002, detailing its efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help it attain that goal.

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.<sup>2</sup> MMC now files this instant report with the Commission.

**I. Carrier Background**

MMC provides analog and digital TDMA CMRS wireless service in the Missouri 7 - Sedalia RSA.<sup>3</sup> As detailed below, and as has been acknowledged by the Commission in its grant of MMC's request for waiver of Commission Rule 20.18(c) until December 31, 2003, compliance with the Commission's June 30, 2002 deadline was impractical.<sup>4</sup> By way of background, as with most small rural carriers, the decision on which digital technology to deploy was essentially mandated by the technology decision of its primary roaming partners in the nearby major markets. In MMC's case, its RSA lies between the Kansas City and Columbia, Missouri MSAs. At the time MMC began rollout of its digital migration, its primary roaming

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<sup>1</sup>In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

<sup>2</sup>*Id.*

<sup>3</sup>Station KNKN595 (CMA510B) and KNKR207 (CMA024B-2).

<sup>4</sup> In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Order*, CC Docket No. 94-102, DA 02-1540 (rel. June 28, 2002), ("*Order*"). (Granting MMC waiver of the rule until December 31, 2003.)

partners, the B-side licensees in each market (Southwestern Bell, now Cingular Wireless in the Kansas City market and US Cellular in the Columbia Market) had already deployed TDMA digital.

As the Commission is well aware, during at least the past twenty-four (24) months, the two major carriers utilizing TDMA technology (Cingular and AT&T) announced their plans to migrate their TDMA deployments to a totally different, non-compatible digital technology. At the end of December 2001, US Cellular reported having decided to migrate its remaining TDMA markets to CDMA digital technology. The Cingular/AT&T decisions led to the announcements by virtually all major cellular infrastructure providers, including Nortel Networks, Inc. ("Nortel") (MMC's infrastructure provider), of plans to cease development of new features and functionalities for their TDMA infrastructure equipment. During the Fourth Quarter of 2001, MMC filed a request for waiver of the Commission's December 31, 2001 and June 30, 2002 deadlines, until December 31, 2003.<sup>5</sup> In support of its request for waiver, MMC met with the Commission.<sup>6</sup> Further, MMC filed a supplement to its waiver request to answer questions asked by Commission staff in the aforementioned meeting.<sup>7</sup> As noted above, the Commission recently granted MMC's request for waiver.

## **II. Access to 911 Through TTY Devices**

### **A. Development Activities**

While Commission action on its waiver request was pending, and through June 30, 2002, MMC did not proceed with development activities, except to replace its switch processors and obtain the necessary switch hardware upgrades to enable it to migrate to MTX10, the minimum software load necessary to deploy the TDMA feature-specific TTY compatibility software, and other FCC-mandated capabilities. Based on cost constraints, and the necessity of migrating to a different technology, MMC did not deploy the TDMA feature-specific TTY compatibility software.

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<sup>5</sup>Petition of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular for waiver of Section 20.18(c) of the Commission's Rules and the Deadlines Established in the *Fourth Report and Order*, CC Docket No. 94-102, FCC 00-436 (December 21, 2001).

<sup>6</sup> Letter from Kurtis & Associates, P.C. to William Caton, Acting Secretary of the Federal Communications Commission, Notice of *Ex Parte* Communication, CC Docket No. 94-102, DA 02-640 (disclosure of meeting held on March 25, 2002 with representatives of the Wireless Telecommunications Bureau and the Office of Engineering and Technology) (March 25, 2002.)

<sup>7</sup> Letter from Kurtis & Associates, P.C. to William Caton, Acting Secretary of the Federal Communications Commission, Information Sheet, CC Docket No. 94-102, DA 02-640, FCC 00-426 (April 8, 2002).

**B. Testing and Deployment Activities**

While Commission action on its waiver request was pending, and through June 30, 2002, MMC did not proceed with any market-specific testing. However, even if its network was TTY-compatible, the lack of available TTY-compatible TDMA handsets to MMC would have precluded the initiation of testing on the MMC network.

Over the next eighteen months, MMC will work towards implementing an alternative digital technology by December 31, 2003. Once the migration has been completed, any new digital network will be compatible with TTY devices.

**III. Conclusion**

MMC has been granted a waiver of the Commission's June 30, 2002 deadline for compliance with 47 C.F.R. 20.18(c), until December 31, 2003. Because of the announced abandonment of TDMA by MMC's roaming partners, MMC is preparing to migrate its network to an alternate digital technology that will not only meet the TTY-compatibility requirements but will also be capable of meeting the other FCC-mandated capabilities. When MMC makes its migration to a new digital technology, MMC will deploy that technology in a mode fully compatible with TTY devices. As required, under the Commission's recent *Order*, MMC will provide the Commission with quarterly updates on the status of development and deployment, as advised by MMC's infrastructure and handset vendors.

Respectfully Submitted,

Missouri RSA No. 7 Limited Partnership d/b/a  
Mid Missouri Cellular

Dated: July 15, 2002

/s/ Anna E. Ward

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CERTIFICATE OF SERVICE

I, LaWanda Y. Tyson, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 15<sup>th</sup> day of July 2002, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, a copy of this report has been provided to Melinda Littell of the Commission’s Wireless Telecommunications Bureau.

/S/ LaWanda Y. Tyson  
LaWanda Y. Tyson